

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

RAJENDRA BADGAIYAN, M.D.,

Plaintiff,

v.

ANTHONY J. PRINCIPI, PRESIDENT AND
FELLOWS OF HARVARD COLLEGE, AND
GRACE MUSHRUSH, M.D.

Defendants.

CIVIL ACTION NO.

04-12031-JLT

REQUEST FOR ADMISSIONS

AND NOW comes your plaintiff, Rajendra Badgaiyan, and pursuant to Fed. R. Civ. P. 36, files this Request for Admissions, and hereby REQUESTS that defendants, Anthony J. Principi, President and Fellows of Harvard College, and Grace Mushrush, within 30 days after service of this Request make the following ADMISSIONS for the purposes of this action only and subject to all pertinent objections to admissibility which may be interposed at the trial.

I. That each of the following documents is true and accurate:

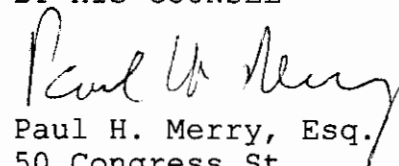
1. The Memorandum of Affiliation, School of Medicine Agreement Between Department of Veteran Affairs (VA) and the Undersigned School of Medicine, attached as Exhibit "A" to the March 26, 2004 Affidavit of Margaret Dale, Associate Dean for Faculty Affairs, Harvard Medical

School.

2. The Accreditation Council for Graduate Medical Education (ACGME) Program Requirements for Residency Training in Psychiatry.
3. The Harvard South Shore Psychiatry Residency Training Program Agreement for the appointment beginning October 19, 2000, signed by Dr. Badgaiyan and Dr. Mushrush.
4. The Harvard South Shore Psychiatry Residency Training Program Agreement for the appointment beginning October 19, 2001, signed by Dr. Badgaiyan and Dr. Mushrush.
5. The Harvard South Shore Psychiatry Residency Training Program Agreement for the appointment beginning January 1, 2003, signed by Dr. Badgaiyan and Dr. Mushrush.

RESPECTFULLY SUBMITTED
RAJENDRA BADGAIYAN,
PLAINTIFF

BY HIS COUNSEL


Paul H. Merry, Esq.

50 Congress St.
10th Floor
Boston, MA 02108
(617) 720-2400
BBO No. 343580

DATE: December 12, 2005